

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

July 12, 2023

FILED

UNITED STATES OF AMERICA

Case No. 23 CR 226

JUL 12 2023 *Jhe*

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

v.

JOSEPHUS TURNER,
also known as "Jamo," and
CALVIN BUNTING,
also known as "White Boy"

Violations: Title 21, United States
Code, Sections 841(a)(1) and 846; and
Title 18, United States Code, Sections
922(g)(1) and 2;

COUNT ONE

1:23-CR-226

Judge Matthew F. Kennelly
M-Judge Young B. Kim

The SPECIAL OCTOBER 2022 GRAND JURY charges:

Beginning no later than in or about May 2021, and continuing until in or about July 2022, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JOSEPHUS TURNER, also known as "Jamo," and
CALVIN BUNTING, also known as "White Boy,"

defendants herein, did conspire with each other, and with others known and unknown to the Grand Jury, to knowingly and intentionally possess with intent to distribute and distribute a controlled substance, namely 40 grams or more of mixtures and substances containing a detectable amount of fentanyl (N-Phenyl-N-[1-(2-phenylethyl)-4-piperidinyl]propenamide), a Schedule II Controlled Substance, a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance, a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, and a quantity of

a mixture and substance containing a detectable amount of cocaine base, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1);

In violation of Title 21, United States Code, Section 846.

COUNT TWO

The SPECIAL OCTOBER 2022 GRAND JURY further charges:

On or about July 17, 2018, at Chicago, in the Northern District of Illinois, Eastern Division,

JOSEPHUS TURNER, also known as “Jamo,”
defendant herein, did knowingly and intentionally distribute a controlled substance, namely, a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT THREE

The SPECIAL OCTOBER 2022 GRAND JURY further charges:

On or about July 25, 2018, at Chicago, in the Northern District of Illinois, Eastern Division,

JOSEPHUS TURNER, also known as “Jamo,”

defendant herein, knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess, in and affecting commerce, a firearm, namely, a Phoenix Arms Company Model HP25A, .25 caliber semiautomatic pistol, bearing serial number 4463314, which firearm had traveled in interstate commerce prior to defendant’s possession of the firearm;

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT FOUR

The SPECIAL OCTOBER 2022 GRAND JURY further charges:

On or about July 25, 2018, at Chicago, in the Northern District of Illinois, Eastern Division,

JOSEPHUS TURNER, also known as “Jamo,”
defendant herein, did knowingly and intentionally distribute a controlled substance, namely a mixture and substance containing a detectable amount of cocaine base, a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT FIVE

The SPECIAL OCTOBER 2022 GRAND JURY further charges:

On or about November 5, 2020, at Chicago, in the Northern District of Illinois,
Eastern Division,

JOSEPHUS TURNER, also known as “Jamo,”
defendant herein, did knowingly and intentionally distribute a controlled substance,
namely a mixture and substance containing a detectable amount of cocaine base, a
Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT SIX

The SPECIAL OCTOBER 2022 GRAND JURY further charges:

On or about July 7, 2021, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JOSEPHUS TURNER, also known as “Jamo,” and
CALVIN BUNTING, also known as “White Boy,”

defendants herein, did knowingly and intentionally possess with intent to distribute a controlled substance, namely 40 grams or more of mixtures and substances containing a detectable amount of fentanyl (N-Phenyl-N-[1-(2-phenylethyl)-4-piperidinyl]propenamide), a Schedule II Controlled Substance, a quantity of mixtures and substances containing a detectable amount of heroin, a Schedule I Controlled Substance, and a quantity of mixtures and substances containing a detectable amount of cocaine base, a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT SEVEN

The SPECIAL OCTOBER 2022 GRAND JURY further charges:

On or about September 8, 2021, at Chicago, in the Northern District of Illinois,
Eastern Division,

JOSEPHUS TURNER, also known as “Jamo,” and
CALVIN BUNTING, also known as “White Boy,”

defendants herein, did knowingly and intentionally distribute a controlled substance, namely a quantity of mixtures and substances containing a detectable amount of fentanyl (N-Phenyl-N-[1-(2-phenylethyl)-4-piperidinyl]propenamide), a Schedule II Controlled Substance, and a quantity of mixtures and substances containing a detectable amount of heroin, a Schedule I Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

FORFEITURE ALLEGATION

The SPECIAL OCTOBER 2022 GRAND JURY further charges:

1. Upon conviction of an offense in violation of Title 21, United States Code, Sections 841 and 846, as set forth in this Indictment, defendants shall forfeit to the United States of America any property which constitutes and is derived from proceeds obtained, directly and indirectly, as a result of the offense; and any property used, and intended to be used, in any manner and part, to commit and facilitate commission of the offense, as provided in Title 21, United States Code, Section 853(a)(2).

2. The property to be forfeited includes, but is not limited to:

a. funds in the amount of approximately \$1,046 seized from the person of CALVIN BUNTING on or about July 7, 2021; and

b. funds in the amount of approximately \$1,746 seized from the person of JOSEPHUS TURNER on or about July 7, 2021.

3. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty, the

United States of America shall be entitled to forfeiture of substitute property, as provided in Title 21, United States Code, Section 853(p).

A TRUE BILL:

FOREPERSON

ACTING UNITED STATES ATTORNEY